

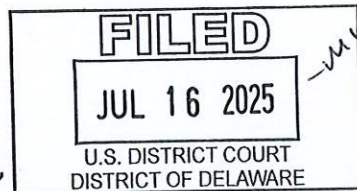
IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

Roberta F. Harden,
Plaintiff,

v.

Arbor Management, LLC d/b/a Stoneybrook Apartments,
Defendant(s).



Civil Action No. 25 - 881

Jury Trial Demanded

COMPLAINT

PARTIES

1. Plaintiff, Roberta F. Harden, is a resident of New Castle County, Delaware, residing at 210 Dewey Ct, Claymont, DE 19703.
2. Defendant, Arbor Management, LLC d/b/a Stoneybrook Apartments, is a property management company operating in the State of Delaware and responsible for the rental property at 210 Dewey Ct, Claymont, DE 19703.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff alleges violations of federal law, including the Fair Housing Act, the Americans with Disabilities Act (ADA), and the Violence Against Women Act (VAWA).
4. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because the events or omissions giving rise to the claims occurred in this District.

FACTUAL BACKGROUND

5. Plaintiff entered into a lease agreement with Defendant on or about September 1, 2023 for a rental unit at 210 Dewey Ct, Claymont, DE.
6. Upon move-in, Plaintiff discovered the unit was in uninhabitable condition, with unsanitary and unsafe living conditions including filth, foul odors, and physical damage to the premises.
7. Plaintiff has been subjected to discriminatory treatment and harassment by Defendant's employees, including unauthorized entry into her home, improper disclosures of confidential information, retaliation for filing complaints, denial of reasonable accommodations, and interference with her tenancy rights.

CAUSES OF ACTION

Count I – Fair Housing Act Violations (42 U.S.C. § 3601 et seq.)

8. Defendant engaged in discriminatory housing practices based on Plaintiff's race, disability, and familial status, and retaliated against her for asserting her rights.

Count II – Americans with Disabilities Act (ADA)

9. Defendant failed to make reasonable accommodations for Plaintiff's disabilities and those of her household, in violation of the ADA.

Count III – VAWA Violations

10. Defendant disclosed Plaintiff's identity in violation of confidentiality requirements under the Violence Against Women Act.

Count IV – Invasion of Privacy / Trespass

11. Defendant unlawfully entered Plaintiff's residence and recorded video without consent, violating her privacy rights.

Count V – Retaliation / Harassment

12. Defendant continuously harassed Plaintiff and her guests, retaliated against her for seeking code enforcement, and used unjustified threats to terminate her tenancy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

- a. Compensatory damages in an amount to be determined at trial;
- b. Punitive damages;
- c. Injunctive relief prohibiting further discrimination and harassment;
- d. Reasonable attorney's fees and costs;
- e. Any other relief the Court deems just and proper.

Respectfully submitted,

Roberta Harden
Roberta F. Harden

210 Dewey Ct
Claymont, DE 19703

Dated: July 11, 2025